

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF TEXAS

BEAUMONT DIVISION

REJI SAMUEL, et al.,  
Plaintiffs

v.

CIVIL ACTION NO: 1:13-cv-00323

DISTRICT JUDGE  
MARCIA A. CRONE

SIGNAL INTERNATIONAL, LLC, et al.,  
Defendants

MAGISTRATE JUDGE  
ZACK HAWTHORN

**ANSWER TO PLAINTIFFS' COMPLAINT ON BEHALF OF  
SACHIN DEWAN AND DEWAN CONSULTANTS PVT. LTD.**

NOW INTO COURT, through undersigned counsel, come Sachin Dewan and Dewan Consultants Pvt. Ltd. ("Dewan Consultants") (collectively referred to as the "Dewan defendants"), who hereby answer plaintiffs' Complaint and as follows:

1.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.<sup>1</sup>

2.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

3.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

4.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

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<sup>1</sup> The number used for each answer herein refers to the numerical paragraph utilized by plaintiffs in their Complaint.

5.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

6.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

7.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

8.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

9.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

10.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied. The Dewan Defendants respectfully submit that venue is improper in the United States District Court Eastern District of Texas – Beaumont Division. The Dewan Defendants submit that this matter should be transferred to the United States District Court Eastern District of Louisiana, where the initial action was brought against many of the defendants and to which subsequent actions brought by other plaintiffs in the United States District Court for the Southern District of Mississippi were transferred. The Dewan defendants are aware of this Court's recent ruling affirming the magistrate judge's order denying Signal's Motion to Transfer this case to the Eastern District of Louisiana (R. Doc. 63).

However, for the purpose of any and all future proceedings arising out of this case in which the transfer of venue may be at issue, including any future motions to reconsider or appeals, the Dewan defendants reserve their right to urge that this matter is subject to transfer to the Eastern District of Louisiana pursuant to the “first-filed rule” or 28 U.S.C. § 1404.

11.

The allegations set forth in this paragraph of plaintiffs’ Complaint are denied.

12.

The allegations set forth in this paragraph of plaintiffs’ Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

13.

The allegations set forth in this paragraph of plaintiffs’ Complaint are denied for lack of sufficient information to justify a belief therein.

14.

The allegations set forth in this paragraph of plaintiffs’ Complaint call for legal conclusions and therefore require no response from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

15.

The allegations set forth in this paragraph of plaintiffs’ Complaint call for legal conclusions and therefore require no response from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

16.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

17.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied as written.

18.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied as written.

19.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein, and denied insofar as these allegations claim that plaintiffs were "induced" to leave Mumbai, India to work for Signal in Orange, Texas.

20.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein, and denied insofar as these allegations claim that plaintiffs were "induced" to leave Mumbai, India to work for Signal in Orange, Texas.

21.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein, and denied insofar as these allegations claim that plaintiffs were "induced" to leave Mumbai, India to work for Signal in Orange, Texas.

22.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein, and denied insofar as these allegations claim that plaintiffs were "induced" to leave Mumbai, India to work for Signal in Orange, Texas.

23.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein, and denied insofar as these allegations claim that plaintiffs were "induced" to leave Mumbai, India to work for Signal in Orange, Texas.

24.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein, and denied insofar as these allegations claim that plaintiffs were "induced" to leave Mumbai, India to work for Signal in Orange, Texas.

25.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein, and denied insofar as these allegations claim that plaintiffs were "induced" to leave Mumbai, India to work for Signal in Orange, Texas.

26.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein, and denied insofar as these allegations claim that plaintiffs were "induced" to leave Mumbai, India to work for Signal in Orange, Texas.

27.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein, and denied insofar as these allegations claim that plaintiffs were "induced" to leave Mumbai, India to work for Signal in Orange, Texas.

28.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein, and denied insofar as these allegations claim that plaintiffs were "induced" to leave Mumbai, India to work for Signal in Orange, Texas.

29.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein, and denied insofar as these allegations claim that plaintiffs were "induced" to leave Mumbai, India to work for Signal in Orange, Texas.

30.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein, and denied insofar as these allegations claim that plaintiffs were "induced" to leave Mumbai, India to work for Signal in Orange, Texas.

31.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein, and denied insofar as these allegations claim that plaintiffs were "induced" to leave Mumbai, India to work for Signal in Orange, Texas.

32.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein, and denied insofar as these allegations claim that plaintiffs were "induced" to leave Mumbai, India to work for Signal in Orange, Texas.

33.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein, and denied insofar as these allegations claim that plaintiffs were "induced" to leave Mumbai, India to work for Signal in Orange, Texas.

34.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein, and denied insofar as these allegations claim that plaintiffs were "induced" to leave Mumbai, India to work for Signal in Orange, Texas.

35.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein, and denied insofar as these allegations claim that plaintiffs were "induced" to leave Mumbai, India to work for Signal in Orange, Texas.

36.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

37.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

38.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

39.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

40.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

41.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

42.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

43.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

44.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

45.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

46.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

47.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

48.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

49.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied as written, and further denied to the extent that it alleges that "tortious conduct" was committed in Texas or anywhere else.

50.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied as written, and further denied to the extent that it alleges that "tortious conduct" was committed in Texas or anywhere else.

51.

The allegations set forth in this paragraph of plaintiffs' Complaint that Dewan Consultants Pvt. Ltd is a private limited liability company organized under the laws of India and maintains an office in Mumbai (Bombay) are admitted. The remaining allegations are denied, and further denied to the extent that it alleges that Dewan Defendants committed "tortious conduct" in Texas or anywhere else.

52.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied as written, and further denied to the extent that it alleges that "tortious conduct" was committed in Texas or anywhere else.

53.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

54.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

55.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

56.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

57.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

58.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied for lack of sufficient information to justify a belief therein .

59.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

60.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

61.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

62.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

63.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied for lack of sufficient information to justify a belief therein.

64.

The allegations set forth in this paragraph are denied for lack of sufficient information to justify a belief therein, and further denied to the extent that it alleges that “tortious conduct” was committed in Texas or anywhere else.

65.

The allegations set forth in this paragraph of plaintiffs’ Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied for lack of sufficient information to justify a belief therein.

66.

The allegations set forth in this paragraph of plaintiffs’ Complaint are denied.

67.

The allegations set forth in this paragraph of plaintiffs’ Complaint are denied.

68.

The allegations set forth in this paragraph of plaintiffs’ Complaint call for legal conclusions and therefore require no response from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

69.

The allegations set forth in this paragraph of plaintiffs’ Complaint are denied as written.

70.

The allegations set forth in this paragraph of plaintiffs’ Complaint call for legal conclusions and therefore require no response from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

71.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

72.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

73.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

74.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied as written.

75.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied as written.

76.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied. Further, all of the allegations set forth in Exhibit 1 are denied for lack of sufficient information to justify a belief therein, denied as written, or denied.

77.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

78.

The allegations set forth in this paragraph of plaintiffs' Complaint call for legal conclusions and therefore require no response from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

79.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

80.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

81.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied for lack of sufficient information to justify a belief therein.

82.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

83.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied as written.

84.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied as written.

85.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

86.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

87.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

88.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

89.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

90.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

91.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

92.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

93.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

94.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

95.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied as written, and denied insofar as the allegations state that "the Defendants' promises and representations were false."

96.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

97.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied as written.

98.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

99.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

100.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied as written.

101.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

102.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

103.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

104.

The allegations set forth in this paragraph of plaintiffs' Complaint call for legal conclusions and therefore require no response from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

105.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

106.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

107.

The allegations set forth in this paragraph of plaintiffs' Complaint call for legal conclusions and therefore require no response from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

108.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

109.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

110.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

111.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

112.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

113.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

114.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

115.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

116.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

117.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied as written.

118.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

119.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

120.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

121.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

122.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

123.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied as written.

124.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied as written.

125.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

126.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

127.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

128.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

129.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

130.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

131.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

132.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

133.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

134.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

135.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

136.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

137.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

138.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

139.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied for lack of sufficient information to justify a belief therein.

140.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied for lack of sufficient information to justify a belief therein.

141.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

142.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

143.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

144.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

145.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

146.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

147.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

148.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

149.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

150.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

151.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

152.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

153.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied..

154.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

155.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

156.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

157.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

158.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

159.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

160.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

161.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

162.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

163.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied for lack of sufficient information to justify a belief therein.

164.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied as written.

165.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

166.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied for lack of sufficient information to justify a belief therein.

167.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

168.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

169.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

170.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied for lack of sufficient information to justify a belief therein.

171.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied for lack of sufficient information to justify a belief therein.

172.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied for lack of sufficient information to justify a belief therein.

173.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied for lack of sufficient information to justify a belief therein.

174.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied for lack of sufficient information to justify a belief therein.

175.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

176.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

177.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

178.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

179.

The allegations set forth in this paragraph plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein, and further deny that the there was any contractual or any other obligation to refund for unsuccessful green card and visa processing.

180.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

181.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied

182.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied

183.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied

184.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

185.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

186.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

187.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

188.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

189.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

190.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

191.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

192.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, all allegations set forth in Exhibit 1 are denied.

193.

The allegations set forth in this paragraph of plaintiffs' Complaint require no answer from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

194.

The allegations set forth in this paragraph of plaintiffs' Complaint call for legal conclusions and therefore require no response from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

195.

The allegations set forth in this paragraph of plaintiffs' Complaint call for legal conclusions and therefore require no response from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

196.

The allegations set forth in this paragraph of plaintiffs' Complaint call for legal conclusions and therefore require no response from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

197.

The allegations set forth in this paragraph of plaintiffs' Complaint call for legal conclusions and therefore require no response from the Dewan defendants. However, out of an abundance of caution, said allegations are denied.

198.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

199.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

200.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

201.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

202.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

203.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

204.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

205.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

206.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

207.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

208.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

209.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

210.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

211.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

212.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

213.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

214.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

215.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

216.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

217.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

218.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

219.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

220.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

221.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

222.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

223.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

224.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

225.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

226.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

227.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

228.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

229.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

230.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

231.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

232.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

233.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

234.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

235.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

236.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

237.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

238.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied.

### **PLAINTIFFS' RICO FRAUD CHART (EXHIBIT 1)**

The Dewan Defendants further answer Plaintiffs' RICO Fraud Chart (Exhibit 1) as follows:

F-1.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

F-2.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

F-3.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

F-4.

The allegations set forth in this paragraph of plaintiffs' Complaint are denied for lack of sufficient information to justify a belief therein.

F-5.

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## **AFFIRMATIVE DEFENSES**

The Dewan defendants hereby set forth their affirmative defenses as follows:

1.

This Court lacks personal jurisdiction over the Dewan defendants.

2.

Plaintiffs have failed to state a claim upon which relief can be granted in connection with any and/or all of their claims or causes of action against the Dewan defendants.

3.

This Court lacks subject matter jurisdiction over any and/or all claims or causes of action against the Dewan defendants.

4.

Plaintiffs' claims and/or causes of action against the Dewan defendants are barred by any applicable statute of limitations or preemption.

5.

At all times pertinent hereto, the Dewan defendants acted good faith and in a lawful manner in connection with their dealings and/or contracts with plaintiffs. At no time did the Dewan defendants or any of their employees intentionally or negligently mislead any of the plaintiffs in any manner.

6.

At all times pertinent hereto, the contracts entered into by the Dewan defendants with plaintiffs were arms-length transactions under which either party could have refrained from becoming a signatory thereto prior to their execution.

7.

The fees charged by the Dewan defendants to all plaintiffs for recruitment services were fair and reasonable.

8.

Plaintiffs have failed to plead fraud against the Dewan defendants with particularity pursuant to Rule 9(b) of the Federal Rules of Civil Procedure

9.

Plaintiffs have not suffered any damages.

10.

Plaintiffs are barred from recovery due their own fraudulent conduct.

11.

Plaintiffs are solely at fault and/or negligent in causing any damages they may have suffered.

12.

Plaintiffs are comparatively negligent.

13.

The Dewan defendants are not liable for actions and/or omissions of any third parties over whom they reasonably relied to carry out and/or perform specific functions and tasks in good faith and/or third-parties whose advice and information was reasonably relied, when the Dewan defendants exercised no authority or control over any of these third parties.

14.

Plaintiffs' claims are barred or reduced by the doctrine *in pari delicto*.

15.

Any damages suffered by plaintiffs (all of which are denied) should be offset by the benefits and income they received from Signal and/or which they could have received had they not left Signal's employ or performed acts which caused the termination of their employment with Signal, and/or which they have otherwise received while working in the United States.

16.

Plaintiffs have failed to mitigate their damages.

17.

The Dewan defendants hereby adopt and incorporate all affirmative defenses asserted by any other party to the extent applicable. Further, the Dewan defendants reserve the right to amend and/or supplement in this Answer. Finally, the Dewan defendants demand a jury trial.

WHEREFORE, Sachin Dewan and Dewan Consultants Pvt. Ltd. pray that this Answer to Plaintiffs' Complaint be deemed good and sufficient, and that after due proceedings, including a jury trial of this matter, there be Judgment herein in their favor dismissing all claims against them with prejudice; for a Judgment in their favor for all attorney's fees and costs incurred by them in the

defense of this matter; and for all general and equitable relief to which they may be entitled.

Respectfully submitted;

*/s/ Stephen H. Shapiro*  
STEPHEN H. SHAPIRO (#21076)  
Attorney at Law  
A Limited Liability Company  
700 Camp Street  
New Orleans, LA 70130  
Telephone: (504) 309-8442  
E-mail: steve@shapirolaw-nola.com

**Counsel for Sachin Dewan and  
Dewan Consultants Pvt. Ltd.**

**CERTIFICATE OF SERVICE**

I hereby certify that this Answer to Plaintiffs' Complaint on Behalf of Sachin Dewan and Dewan Consultants Pvt. Ltd. has been filed electronically using this Court's ECF system, and therefore has been served on all counsel of record by electronic transmission or by means which this Court has deemed necessary and appropriate on this 17<sup>th</sup> day of February 2014.

*/s/ Stephen H. Shapiro*  
Stephen H. Shapiro